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Remarks

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Entry of the above-noted amendments, reconsideration of the application, and allowance of all claims pending are respectfully requested. By this amendment, claims 1, 3-4, 7-8, 10-11, 13, 19-20, 23-26, 37, and 40-42 are amended and claims 2 and 22 are canceled. These amendments to the claims constitute a bona fide attempt by applicants to advance prosecution of the application and obtain allowance of certain claims, and are in no way meant to acquiesce to the substance of the rejections. Support for the amendments can be found throughout the specification (e.g., page 14, line 20 to page 15, line 6; page 17, line 17 to page 18, line 9), figures (e.g., FIG. 2), and claims (e.g., previous claims 2 and 22) and thus, no new matter has been added. Claims 1, 3-21, and 23-43 are pending.

Claim Rejections - 35 U.S.C. § 112

Claims 1-43 were rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. The Office Action alleges that the term "one or more of the one or more intelligent network platforms" is indefinite. Claims 1-43 have been amended to replace the cited text with "one or more of at least one intelligent network platform."

Withdrawal of the § 112 rejection is therefore respectfully requested.

Claim Rejections - 35 U.S.C. § 102

Claims 1-43 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Jiang et al. (U.S. Patent App. Pub. No. 2004/0120494, "Jiang"). This rejection is respectfully, but most strenuously, traversed.

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Applicants respectfully submit that the Office Action's citations to the applied references, with or without modification or combination, assuming, *arguendo*, that the modification or combination of the Office Action's citations to the applied references is proper, do not teach or suggest the first call leg from the calling communication device to the intelligent network platform and the second call leg from the intelligent network platform to the called communication device, as recited in applicants' independent claim 1.

For explanatory purposes, applicants discuss herein one or more differences between the claimed invention and the Office Action's citation to Jiang. This discussion, however, is in no way meant to acquiesce in any characterization that one or more parts of the Office Action's citations to Jiang correspond to the claimed invention.

Jiang (paragraph 38; FIG. 2) discloses:

Operation of the system of FIG. 3 is similar to that of FIG. 2. Switch 104 is informed of a call from user 108 to user 110. The switch 104 notifies the SCP 114, which in turn supplies ringback routing information. Switch 104 responds by connecting IP 116 to caller 108 for a custom ringtone and also initiates a call with caller 110. When caller 110 picks up, the users 108 and 110 are connected.

Jiang discloses that the switch 104 connects the intelligent peripheral 116 to the caller 108, for example, a first call leg. The switch 104 also initiates the call with the caller 110, for example, a second call leg. When the caller 110 picks up, the users 108 and 110 are connected. However, Jiang discloses that the first call leg is dropped, not connected to the second call leg. Referring to step 11 of FIG. 4 and paragraph 78 of Jiang, the MSC brings down the first call leg to the IP/IVR by the ISUP RELEASE message. Jiang fails to disclose the first call leg from the calling communication device to the intelligent network platform and the second call leg from the intelligent network platform to the called communication device.

Accordingly, the Office Action's citation to Jiang fails to satisfy at least one of the limitations recited in applicants' independent claim 1.

For all the reasons presented above with reference to claim 1, claims 1, 20, 25, 26, 37, and 40 are believed neither anticipated nor obvious over the art of record. The corresponding dependent claims are believed allowable for the same reasons as independent claims 1, 20, 25, 26, 37, and 40, as well as for their own additional characterizations.

Withdrawal of the § 102 rejections is therefore respectfully requested.

In view of the above amendments and remarks, allowance of all claims pending is respectfully requested. If a telephone conference would be of assistance in advancing the prosecution of this application, the Examiner is invited to call applicants' attorney.

Respectfully submitted,



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